

June 27, 2024

VIA ELECTRONIC MAIL

Judge John P. Cronan
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Pyne et al. v. CKR Law LLP, et al., Case No. 1:24-cv-02912-JPC

Dear Judge Cronan:

I was the Managing Partner of CKR Law LLP (“CKR”). CKR and I are the named defendants in the above-referenced action. CKR discontinued operations in 2021.

On May 17, 2024, at a status conference on a related case (*NAVCAN.DC, Inc. et al. v. Jeffrey Rinde, et al.*, Case No. 1:23-cv-02267-LGS), I was personally served with the Summons and Complaint in this action. I handed the Summons and Complaint to my counsel, Michael Maloney, who I expected would file an answer in this action. On June 13, 2024, Mr. Maloney forwarded to me a copy of this Court’s Order dated June 12, 2024. I was unaware prior to that date that no answer was previously filed.

Due to an unresolved fee dispute, Mr. Maloney was granted leave to withdraw in the related case by order of Magistrate Judge Willis dated June 21, 2024. In that action, Judge Willis gave CKR and me, until July 8, 2024, to retain new counsel or inform the Court that I intended to appear pro se. As of the date of that Order, Mr. Maloney had not filed an answer in this action.

Therefore, I respectfully request until July 8, 2024, to retain new counsel who will represent CKR and me in both this action and the related matter, or notify this Court that I intend to appear pro se.

Thank you for your consideration.

Regards,



Jeffrey A. Rinde

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